

Plaintiff

3:21-CV-05068-LK-SKV

V.

Pierce County Council et al

Defendants

Motion to:

Show Cause ... Strike ...
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OCT 13 2022

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DEPUTY

1.1) I Plaintiff, Justin A. Davey A.K.A. Echota Wolf Clan, Moves the defendants (attorney Frank Cornelius) to "Show-Cause", why the deposition, held at Score Tail on October 5th 2022, (The Entire Recording and Transcript), Should not be "Striked", and "Sealed", from record, and any other eyes including, "Public, defendants, Plaintiff and Courts," for Multiple Reasons as explained below.

1.2) I, Plaintiff, felt extremely bullied, "not threatened", but intimidated. I am confident that, "Me being deposed", was Rushed and Hurried as explained more below. I would also like to note that I was often Confused at times during the deposition hearing, Causing me to either answer "improperly" at times or "Rambled" without understanding what I was saying. I was very depressed (emotionally), Causing my mind to be Cloudy, which could have been from the new (Anti-Depressant) Medication that I Started the very Morning of the Deposition (October 5th) hearing called "Well-butrin". Lastly, but foremost, the un-Professional conduct of defendants attorney "Frank Cornelius, Should be Considered closely at all Cost" in this Matter.

"Discussion"

1.3) Defendants Attorney, "Frank Cornelius", took advantage of Plaintiff's Situation while Plaintiff was at a vulnerable

1.4) Plaintiff is undergoing or is Court ordered to undergo hospitalization at a State hospital for Competency Restoration (enclosed is Plaintiff's Court Order and Forensic Psychological Report conducted 9-22-2022.)

1.5) Plaintiff gives Authorization to the United States District Court and the Parties at hand to Read the Forensic Psychological Report but ask to Seal it from Public Record.

1.6) Defendants Attorney, Frank Cornelius, knowingly and un-Professionally, questioned Plaintiff while he was awaiting Competency Restoration, and took advantage of the moment.

1.7) Prior to Plaintiff's incarceration, Plaintiff had stopped taking his Prescribed Medication for his Mental Health Treatment (Prior to 9-9-2022). Plaintiff fully relapsed back into his symptoms (diagnoses), and though Plaintiff had been back on his Medication, with one additional Medication added the day of the deposition, (which could have caused one Medication to react differently, causing distractions,) Plaintiff was not fully recovered. Additionally, the "Forensic Psychological Report", Pg. 10, ^{states} Plaintiff was still having episodes of Psychosis and depression as late as 9-19-2022 and placed on the Anti-Psychotic Medication Risperidone on 9-20-2022. Plaintiff, was also taking Vistral (Anxiety) and Prozac (for Nightmares) at the time Risperidone was added to his Treatment Plan.

1.8) Defendants attorney, Frank Cornelius, knowingly took advantage of Plaintiff's Situation, by knowing that Plaintiff was at a vulnerable stage in his Medication Treatment Program. Plaintiff had not even been on his medication for 20 days, he was

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Most Vulnerable, having just taking "Wellbutin" as a Medication the day of the deposition, which could have Caused an increase in the function of Risperidone, and therefore vulnerable to answer questions Properly.

1.9) Given the Circumstances above, it would seem that Defendants Attorney, Frank Cornelius, hurried and rushed for this deposition before I could be at a more stable Place in my life and also rushed before the Court could appt. me Counsel.

1.10) According to Dkt. 73, the Courts Reconsidered Appt. of Counsel, filed 8-8-22, and sufficient to say, Frank Cornelius could have and should have under "Good Faith", waited for the Appt. of Counsel, especially knowing the Circumstances above.

1.11) Additionally, Defendants Attorney, "Frank Cornelius", knowingly went ahead with the deposition hearing, setting it up in Score Tail, knowing that I had no documents Pertaining to the Case in My Possession, which in my belief is a Bully move considering the Circumstances above.

1.12) With all the Circumstances above, I believe that I have made a "Good Faith" argument for this "Show Cause", considering that I wrote a motion to Continue the Deposition until I at least obtained an Attorney according to Dkt. 73

Your Honor

According to the Courts Statement in Dkt 73 Page 3 @ 4-5, "while not dispositive on its own as there is limited information before the court regarding the nature and impact of Plaintiff's Mental illness", I also allow you and want you to read the "Forensic Psychological Report".

Your Honor,
I ask the Courts to Summons, "Disability Rights Washington,"
to stand in on My behalf until a Lawyer is appointed for me, or
to fully Participate on my behalf as my Counsel.

Your Honors

I would like to note that we who suffer from Mental illness are
not at all less human than those who don't. I can read and write, but
My diagnoses interferes with the ability to correctly understand
what I read and write, and at times I can write and ramble
while writing, without me knowing what it is I am
writing. It's called disorganized thought process, and just so
the Courts know, this is my 8th time writing this. Yes I need
help, and without my medication (I am taking now as of
recently) I cannot function. Just look at my first letter to
the Court in September 2022 until now. You can see the
dysfunction even in writing. I am slowly recovering
from my full relapse, but my mental illness is not in
remission.

Thank you for reading and considering My Motion.

Under Penalty and Perjury I believe everything written to
to the best of my knowledge and truth.

Written this day at Score Jail 10-7-22

Signed

Wolfgang E. Echota Wolfclaw

Please send to Defendants Attorney Frank Cornelius
according to the ECF System.

Echta Wolfelton

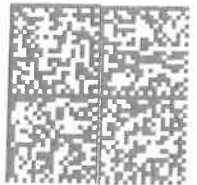
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